

BRENT M. RESH
(Nev. Bar No. 14940)
BRENT RESH LAW, PLLC
2401 La Solana Way
Las Vegas, NV 89102
(702) 781-6903
brent@brentreshlaw.com

JESSICA L. BLOME
(Cal. Bar No. 314898, pro hac vice)
JENNIFER RAE LOVKO
(Cal. Bar No. 208855, pro hac vice)
GREENFIRE LAW, PC
2748 Adeline Street, Suite A
Berkeley, CA 94703
(510) 900-9502
jblome@greenfirelaw.com
rlovko@greenfirelaw.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WILD HORSE EDUCATION, a non-profit
corporation; and LAURA LEIGH,
individually,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
INTERIOR, BUREAU OF LAND
MANAGEMENT, and JON RABY, Nevada
State Director of the Bureau of Land
Management,

Defendants.

CASE NO. 3:23-cv-00372-LRH-CB

**PROPOSED TEMPORARY
RESTRATINING ORDER**

1 1. This matter came before the Court on Plaintiffs' Second Motion for Temporary
2 Restraining Order and Preliminary Injunction, with supporting declarations on October _____,
3 2024, at ____: _____.m. Based on the pleadings, evidence, and oral argument, the court makes
4 the following findings and issues the following temporary restraining order.

5 a. For the purposes of this Order, this Court has jurisdiction over the subject matter
6 of this action and over the parties. The subject matter of this action involves
7 alleged violations of the Wild and Free-Roaming Horses and Burros Act, as
8 alleged in Plaintiffs' Motion.

9 b. Plaintiffs will be irreparably harmed if Defendants proceed with the gather and
10 removal of wild horses of the Triple B Complex without complying with the Wild
11 and Free-Roaming Horses and Burros Act, as alleged in Plaintiffs' Motion.

12 c. No interim harm will result if the Court grants Plaintiffs' request for a temporary
13 restraining order that preserves the status quo pending the outcome of a hearing
14 on Plaintiffs' request for preliminary injunction.

15 2. This temporary restraining order is issued and effective on October _____, 2024,
16 at ____: _____.m.

17
18 IT IS THEREFORE ORDERED that Defendants, their agents, employees, and assigns
19 are enjoined and restrained from conducting any activities related to the gather and removal of
20 wild horses and burros from the Triple B Complex for a period of _____ days beginning
21 on the date of the Court's entry of this order. Defendants must cease and desist gather activities
22 immediately.

23 IT IS FURTHER ORDERED that Defendants shall appear before this court on
24 _____, 2024 at ____: _____.m. in order to show cause why this temporary
25 restraining order should not be extended through the resolution of Plaintiffs' request for a
26 preliminary injunction in this case.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Date: _____

Hon. Miranda M. Du
CHIEF JUDGE
UNITED STATES DISTRICT COURT